

IN THE UNITED STATES PATENT & TRADEMARK OFFICE

5 Applicant: RONALD H. BLUESTONE) Ex. R.R. PATEL
Serial No.: 10/658,950) A/U 1746
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Filing Date: SEPTEMBER 9, 2003)
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10 Title: "Combination Parts Jet Washer &)
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15 DECLARATION of DONALD C. KUEHNERT
 37 C.F.R. 1.132

1. I, DON KUEHNERT, Born September 4th 1946 in Los Angeles, California, have been selling Parts Washing equipment since 1970. I am considered by my business associates and peers as a technical expert in the field of parts washing equipment and solutions to parts washing applications. I have been a paid expert witness in a court case in reference to Parts Washing Equipment. Over the past 36 years, I have sold thousands of parts washers from manual sink types to fully automated robot controlled systems, to auto repair dealerships, auto repair shops, metal working shops, aerospace manufacturers, Defense manufacturers and the United States Government.

25 2. I am familiar with parts washers of the type commonly used in shops and garages for removing grime, oil, grease and other contaminants for parts. One type of parts washer is a standard sink-type washer in which a recirculated solvent is dispensed through a nozzle or brush. The user will simply manually scrub the parts with the brush and the solvent assists the in removing contaminants. Sink-type part washers, since they are manual, are often messy and time-consuming to use.

30 3. In addition to manual washers, automatic jet washers are found in the industry. Generally these devices have a cabinet in which is located a spray system connected to a pump for delivering pressurized cleaning solution. The standard jet washer usually

includes a basket or turntable on which parts to be cleaned are placed and subjected to a spray of cleaning material.

4. Insta-Clean Manufacturing of Lake Havasu City, Arizona, offers a line of degreasers
5 and washers which include a cabinet. One model, the Insta-Clean IC4, has a large load capacity for accommodating large parts such as engine blocks and the like.

5. I have reviewed the subject patent application filed by the Bluestones for a combination parts jet washer and sink washer.

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6. I have reviewed the subject patent application and letter from the Patent Office dated July 20, 2006, along with the prior art references cited by the Examiner.

15 6. I understand the Applicants' invention to be a parts washer which preferably utilizes a biodegradable detergent solution which washer can be used both as a manual parts washing sink, an automatic jet washer or a portable washer for parts such as brake parts. The washer has a cabinet which defines a reservoir. An enclosure houses a jet washer compartment and contains electrical connections located in the cabinet. A heater may be provided for maintaining the washing solution at a suitable temperature. A basket for

20 receiving parts to be washed is located within the housing and is mounted for rotation and suitable bearings. The rotation of the basket is driven in the upper part of the cabinet either by suction-induced fluid flow to the pump or by a drive such as a gear motor. The pump has an inlet near the bottom of the housing which will deliver pressurized fluid to a manifold spray and directs pressurized fluid both vertically and horizontally in order to fully cover the parts in the jet washer compartment. An important feature of the invention
25 is that the upper open end of the cabinet receives a movable parts sink which may be stainless steel or other durable material. The sink serves two important functions. First, the sink is useable by itself as a manual parts washing sink with a flow-through brush.

The sink also serves as a lid or cover for the jet washer compartment. Secondly, the sink is mounted so that it may be moved to an open position to access the jet washer below the sink. The sink is provided with a central drain which discharges through a strainer. A baffle in the jet spray compartment deflects jet spray so that it does not discharge upwardly through the sink drain.

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7. Accordingly, the invention provides a highly versatile parts washer providing the combined features of three different washing units; (1) an automatic jet washer; (2) a manual sink washer; and (3) a brake parts washer utilizing a water-based solution. The triple function which integrates a manual parts washing sink, an automatic jet washer and a brake parts washer results in a versatile device which can meet the needs and requirements of both small and large shops.

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8. The triple purpose manual sink, automatic jet washer and brake parts washer provides advantages not available with prior art systems in which manual sinks and jet washers were separate units. This required shops often to purchase or have three separate units which adds to costs and inefficiencies in operation. The Bluestones' unit allows a mechanic to perform three tasks with a single unit without the transfer of messy, dripping parts.

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9. The Bluestones' invention is a revolutionary departure from prior art washers. In my 36 years of experience in which I have personally visited thousands of shops having parts washers, I have never seen an integral unit combining the features of any two washers. Combining three washers, a manual parts washing sink, an automatic jet washer and a brake parts washer is revolutionary. The integral design also provides additional economies. A single pump can be used to provide solvent or cleaning solution to both the sink and jet washer. Further, the reservoir collects fluid from both the sink and jet washer portions so only a single reservoir is required and the reservoir will supply both units.

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10. In Wilson, U.S. Patent No. 5,368,053, shows a machine for cleaning parts and includes a reservoir and two tanks. A wash solution is contained in one of the tanks and a rinse solution contained in the other tank. Pumps transfer the wash and rinse solutions from the tanks to the reservoir. A basket for holding the parts is moveable between a
5 loading position, cleaning position and a draining position. When the basket is in the cleaning position inside the reservoir, it is rotated in an opposite direction to improve the cleaning efficiency. I have not seen the device of Wilson in use or operation in the shops I have visited during my many years of experience. The device, as described, is not a portable device and requires two separate tanks, one for a wash solution and one for a
10 rinse solution. The operation of the device requires the parts to be moved between a washing position in one tank to a rinsing position in the second tank. The patent does in any way suggest the combination of a manual parts washer, an automatic jet washer and a brake parts washer, particularly one in which the sink portion serves both as a sink for the manual washing of parts and also serves as an enclosure or top for the jet washer. The
15 Wilson device is not designed for washing automotive parts and does not perform multiple functions as in the Bluestones' device.

11. The patent to Lee, U.S. Patent No. 5,349,708, relates to a foldable kitchen sink. As I read the patent, the foldable sink has a dishwasher bucket and a grill-type rack and, once
20 unfolded, may be used as a conventional sink. The grill provides a place for a cooking heater. The sink may be used as a conventional sink. The device may be folded for transportation or storage. The Lee device will not wash automotive parts and does not combine a manual parts washing sink, an automatic jet washer and brake parts washer.

25 12. In reading these two patents, I do not find any suggestion in either patent of the desirability of combining the two. My understanding of patent law is that references can only be combined if there is some suggestion or incentive in the prior art to do so.

13. The combination of a foldable kitchen sink and a multi-compartment parts washer is not obvious and, even if combined, would not result in the Bluestones' invention.

While the teachings of the patent to Lee and the patent to Wilson to my mind are not compatible, if they were combined such combination would require considerable

5 mechanical skill and modification. The result, at most, would be the attachment of some type of folding, portable sink to the machine of Wilson. This still would not result in Bluestones' invention. The Bluestones' invention is not simply the inclusion of a portable sink in combination with a parts washer, but rather is an integral unit and which has *a jet washer disposed below the portable sink with the portable sink providing a manual parts washing area and which sink also serves as the lid or cover and brake parts washer to the subjacent parts washer.* Further, the Bluestones' invention allows a single fluid reservoir to service or provide fluid to both the parts washer and the jet washer cabinet.

10 14. Other features of the claims of the Bluestone application relate to certain secondary or dependent features. Features, such as those set forth in Claim 8, in which the fluid pressure is used to rotationally drive the parts basket are also believed new and novel.

15 15. In summary, based on my experience in the art, I believe the combination parts jet
20 washer / sink washer / brake parts washer invented by the Bluestones' represents a substantial, non-obvious improvement over the prior art or any other parts washers on the market today. In my years of experience in the automotive and industrial fields I have seen many parts cleaning equipment that have been patented. In my opinion, the Bluestones' certainly are entitled to patent protection. The Bluestones' deserve to be
25 protected against others capitalizing on their hard labor and achievement in creating this invention.

and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001 and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

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Dated: October 31, 2006 

Donald C. Kuehnert